

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

UNITED STATES DISTRICT COURT

for the

District of Delaware

Civil Division

20 - 1624

Rrichard andYael Sinrod

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Albertson Compnies /Inc. and Ad Acquisition, LLC.

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. and

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

2020 NOV 30 PM 12:01
U.S. DISTRICT COURT
DISTRICT OF DELAWARE

COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE
(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Richard T. Sinrod Yael Sinrod
Street Address	Both reside at 250 Silky Dogwood Lane,
City and County	Middletown, New Castle County
State and Zip Code	De 19709
Telephone Number	302-378-2489
E-mail Address	alyman4192@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Albertson Companies, Inc.
Job or Title <i>(if known)</i>	
Street Address	250 East Parkcenter Blvd.O
City and County	Boise, County of
State and Zip Code	Idaho 83796
Telephone Number	866-2583217 208-395-6200
E-mail Address <i>(if known)</i>	www.latitimes.com

Defendant No. 2

Name	Ab Acquisition,LLC.
Job or Title <i>(if known)</i>	
Street Address	250 E. Parkcenter Blvd
City and County	Boise, Boise County
State and Zip Code	Boise. 83706
Telephone Number	877-276-9637
E-mail Address <i>(if known)</i>	www.albertsons.com

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

A. The Plaintiff(s)

1. If the plaintiff is an individual

The plaintiff, (name) Richard T. Sinrod and Yael Sinrod, is a citizen of the State of (name) Delaware.

2. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

1. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

2. If the defendant is a corporation

The defendant, (name) Albertson, Inc., is incorporated under the laws of the State of (name) Delaware, and has its principal place of business in the State of (name) Idaho. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) Phoenix, Arizona.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

RICHARD T. and Yael Sinos

Def # 2:

Ab Acquisition, LLC

220 E PARK CHESTER BLVD

BOISE, COUNTY OF BOISE

IDAHO, 83706

877-276-9367

WWW.ALBERTSON.COM

Plaintiff Richard T. Sinrod sustained personal injuries in the sum of \$3,000,000.00 Plaintiff Yael Sinrod, lawfully wedded wife of Plaintiff Richard Sinrod has a Derivative Cause of action and is entitled to damages of \$1,000,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) 11/01/2020, at (place) 460 East Main Street, Middletown, De. 19709,

the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because *(describe the acts or failures to act and why they were negligent)*

Defendant Albertson Company, Inc. owner of the Acme Supermarket and the Defendant Ab Acquisition, LLC, owner of the premises, caused and/or permitted the parking lot at the premises to become and remain in a state of disrepair, causing the Plaintiff Richard T. Sinrod to trip and fall, sustaining serious, severe personal injuries.

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by *(explain)*

See above.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Plaintiff Richard T. Sinrod sustained personal injuries to multiple parts of his body and also sustained psychological injuries and monies spent to medical and hospital care and is entitled to money damages. The Plaintiff Yael Sinrod is entitled to money damages on her derivative Cause of Action. They are also entitled to punitive damages due to Defendant's knowledge of the state of disrepair of the parking lot for an extended period of time and did not repair the parking lot which could and should have been repaired at a minimal expense. By reason thereof, both Plaintiffs are also entitled to punitive damages of \$10,000,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/27/2020

Signature of Plaintiff

Printed Name of Plaintiff

Richard T. Sinrod

Yael Sinrod

B. For Attorneys

Date of signing:

~~1/26/2021~~

11/29/2020

11/29/2020

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address